

**Fill in this information to identify the case:**

Debtor 1 MARK E MCLURE

Debtor 2 ERICA S QUIGGLE  
(Spouse, if filing)

United States Bankruptcy Court for the: Western District of Pennsylvania

Case number 19-20310-CMB

Form 4100R

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of Creditor: Freedom Mortgage Corporation

Court claim no. (if known):  
2

Last 4 digits of any number you use to identify the debtor's account: 3542

Property address: 140 MCKINNEY ROAD  
Number Street  
Wexford, PA 15090  
City State ZIP Code

**Part 2: Prepetition Default Payments**

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 04/01/2024  
MM/DD/YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_
- b. Total fees, charges, expenses, escrow, and costs outstanding: +(b) \$ \_\_\_\_\_
- c. **Total.** Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

\_\_\_\_\_  
MM/DD/YYYY

Debtor1 MARK E MCLURE  
First Middle Last

Case number (if known) 19-20310-CMB

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box::

- ☐ I am the creditor.  
☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x/s/ Matthew Fissel Date 03/11/2024  
Signature

Print Matthew Fissel Title Attorney  
First Name Middle Name Last Name

Company Brock & Scott, PLLC

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 3825 Forrestgate Dr.  
Number Street  
Winston-Salem, NC 27103  
City State ZIP Code

Contact phone 844-856-6646 Email PABKR@brockandscott.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**  
*Pittsburgh Division*

IN RE:  
MARK E MCLURE AND ERICA S QUIGGLE

Freedom Mortgage Corporation,  
Movant

vs.

MARK E MCLURE AND ERICA S QUIGGLE,  
Debtors  
and

Ronda J. Winnecour  
Respondent

Case No. 19-20310-CMB  
Chapter 13

Hearing Date: TBD

Hearing Time: TBD

Objection Date: TBD

**CERTIFICATE OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE PAYMENT**

I certify under penalty of perjury that on this day, I served or caused to be served the Response to Notice of Final Cure Payment on the parties at the addresses shown below or on the attached list.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was:

Via CM/ECF electronic notice:

Brian C Thompson, Esq.  
301 Smith Drive  
Suite 6  
Cranberry Township, PA 16066  
*Counsel for Debtor*

Ronda J. Winnecour  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219  
*Chapter 13 Trustee*

Office of the United States Trustee  
1000 Liberty Avenue  
Suite 1316  
Pittsburgh, PA 15222  
*US Trustee*

Via First Class Mail:

Mark E Mclure  
140 Mckinney Rd  
Wexford, PA 15090

Erica S Quiggle  
140 Mckinney Rd  
Wexford, PA 15090  
*Debtor*

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, names and addresses of parties served by electronic notice will be listed under the heading "Via CM/ECF electronic notice" and those served by mail will be listed under the heading "Via First Class Mail".

EXECUTED ON: March 11, 2024

/s/ Matthew Fissel

Andrew Spivack, PA Bar No. 84439  
Matthew Fissel, PA Bar No. 314567  
Mario Hanyon, PA Bar No. 203993  
Ryan Starks, PA Bar No. 330002  
Jay Jones, PA Bar No. 86657  
Attorney for Creditor  
BROCK & SCOTT, PLLC  
3825 Forrestgate Drive  
Winston Salem, NC 27103  
Telephone: (844) 856-6646  
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E-Mail: PABKR@brockandscott.com